



Ryan Villa <ryan@rjvlawfirm.com>

Warren-Begay et al - Motion to Compel Discovery

3 messages

McGinley, Matthew (USANM) [REDACTED] Fri, Mar 15, 2024 at 9:09 AM
To: "Justine Fox-Young (justine@foxyounglaw.com)" <justine@foxyounglaw.com>, Ryan Villa <ryan@rjvlawfirm.com>, Marc Robert <mhrfedlaw@gmail.com>, "Ahmad@assedlaw.com" <ahmad@assedlaw.com>, Britany Schaffer <britany@assedlaw.com>, Susan Burgess-Farrell <sburgess@burgessporterlaw.com>
Cc: "Dimas, Elisa (USANM)" [REDACTED]

Counsel:

Thank you for giving us time to review John Doe's criminal matter. I will be disclosing from that file certified records from the New Mexico Judiciary as well as from the New Mexico Corrections Department. As for the remainder of the file, I oppose the relief sought in your draft motion to compel.

Please let me know if you have any questions.

Thank you,

Matthew McGinley

Assistant United States Attorney

District of New Mexico

P.O. Box 607

Albuquerque, NM 87102

[REDACTED]

[REDACTED]

[REDACTED]

justine@foxyounglaw.com <justine@foxyounglaw.com> Fri, Mar 15, 2024 at 9:15 AM
To: "McGinley, Matthew (USANM)" [REDACTED]
Cc: Ryan Villa <ryan@rjvlawfirm.com>, Marc Robert <mhrfedlaw@gmail.com>, ahmad@assedlaw.com, Britany Schaffer <britany@assedlaw.com>, Susan Burgess-Farrell <sburgess@burgessporterlaw.com>, "Dimas, Elisa (USANM)" <[REDACTED]>

Matt:

Please tell us what you are withholding from the US v Levi discovery.

Thanks,

Justine

On Mar 15, 2024, at 9:10 AM, McGinley, Matthew (USANM) <Matthew.McGinley@usdoj.gov> wrote:

[Quoted text hidden]

McGinley, Matthew (USANM) [REDACTED]

Fri, Mar 15, 2024 at 10:17 AM

To: "justine@foxyounglaw.com" <justine@foxyounglaw.com>

Cc: Ryan Villa <ryan@rjvlawfirm.com>, Marc Robert <mhrfedlaw@gmail.com>, "ahmad@assedlaw.com"

<ahmad@assedlaw.com>, Britany Schaffer <britany@assedlaw.com>, Susan Burgess-Farrell

<sburgess@burgessporterlaw.com>, "Dimas, Elisa (USANM)" [REDACTED]

Justine,

Thank you for the message.

The United States understands its discovery obligations and reviewed the file. In doing so, the United States does not believe that any material is responsive to the requests made in the draft motion (aside from the certified documents identified below). However, we are still open to producing the file to the Court for review in camera. Aside from that, the United States at this time will not provide a list of documents contained within the file.

Thanks,

Matt

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